



October 5, 2023

**VIA ECF**

Hon. Gary R. Brown  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *McGregor v. Suffolk County, et al.*  
23 Civ. 1130 (GRB)(ARL)

Dear Judge Brown,

I represent the plaintiffs in the above-referenced matter. In accordance with the Court's September 15, 2023 Order, I write on behalf of all parties to provide an update regarding the issues raised in the Court's Memorandum and Order (DE 38), including what changes, if any, defendants Suffolk County and Commissioner Harrison have made or anticipate making concerning their implementation of the Rifle Bill.

Counsel for the parties met and conferred by phone on September 28, 2023, and have been communicating by email, as needed.

It appears that the Suffolk County Licensing Bureau (SCPD) has begun to print the words "Semi-Auto Rifle" on the back of existing New York State pistol licenses. This allows individuals with existing pistol licenses to legally purchase semi-automatic rifles from a Federal Firearms Licensee (FFL)/gun store.

The parties have executed, and Plaintiffs have filed with the Second Circuit, a stipulation pursuant to FRAP 42 withdrawing the appeal of this Court's denial of Plaintiffs' application for a preliminary injunction.

Plaintiffs intend to amend their complaint to reflect recent developments, including the removal of factual allegations related to the temporary use and/or possession of semiautomatic rifles by non-licensed individuals consistent with this Court's Memorandum and Order.

The County defendants do not consent to the amendment of the complaint at this time and ask that Plaintiff be directed to make a formal motion to amend accompanied by a copy of the proposed amended complaint.

Assuming Plaintiffs are granted permission to amend, Superintendent Nigrelli will review the amended complaint upon receipt and make a determination as to how to proceed at that time.

Plaintiffs request until October 30, 2023 to file a motion for leave to amend their complaint.

Very truly yours,

*Amy L. Bellantoni*  
Amy L. Bellantoni

cc: Arlene S. Zwilling, Esq.  
Robert E. Morelli, Esq.  
Patricia M. Hingerton, Esq.